

# Federal Defenders OF NEW YORK, INC.

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August 6, 2021

## VIA ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: United States v. Juan Villar  
07 Cr 639 (NRB)

Dear Judge Buchwald:

I was appointed this morning to represent Mr. Villar on the above-captioned case. Mr. Villar was indicted in 2007 and was just arrested and presented today. I believe this delay violates his Sixth Amendment right to a speedy trial and the case should be dismissed with prejudice. As such, after conferring with the Government, we respectfully submit the following briefing schedule for the Court's consideration: defense's motion to dismiss due on Friday, August 20; Government response due on Friday, September 3; defense reply due on Friday, September 10. I also respectfully ask the Court set a hearing date soon after briefing concludes.

While the motion is pending, the defense respectfully requests the Government consider voluntarily dismissing this matter and allowing Mr. Villar to voluntarily depart the country and return to Santo Domingo, Dominican Republic, which is willing and ready to do. Thank you for your consideration.

Respectfully submitted,

Ian Marcus Amelkin  
Assistant Federal Defender  
Tel.: (212) 417-8733

cc: Thomas Burnett, AUSA

ENDORSEMENT  
*The proposed briefing  
schedule is acceptable.*  
*So Ordered.*  
*Naomi Reice Buchwald,*  
*USDC*  
*August 11, 2021*